

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>IN RE:</b>	)	<b>CASE NO: 16-40290-659</b>
<b>LAURIE MICHELLE ROBERT</b>	)	<b>Chapter 13</b>
	)	
	)	<b>Trustee's Objection to Confirmation</b>
	)	<b>Original Confirmation Hearing set for:</b>
<b>Debtor</b>	)	<b>March 3, 2016 11:00 am</b>

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. Per 341 testimony, Debtor pays \$400 per month for rent and utilities, but Schedule J shows \$675 per month rent expense plus \$90 per month for electricity and natural gas.
2. The Trustee has not received a copy of Debtor's most recently filed tax return. Per 341 testimony, Debtor last filed and was last required to file a tax return in 2011.
3. \$4,000 attorney fees appear high for a case with no secured debt, no vehicles, no real estate, and no employment income that will pay less than \$200 to general unsecured creditors in 60 months.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: February 12, 2016

OBJCONFAP--DSD

/s/ Diana S. Daugherty

Diana S. Daugherty MO36347

Attorney for Trustee

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The undersigned hereby certifies that he served the above notice on this day of February 12, 2016, either through the Court's ECF system or by ordinary mail, postage pre-paid, addressed to:

/s/ Diana S. Daugherty

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